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MAY 18 1999

FCC MAIL ROOM

May 17, 1999

BY OVERNIGHT MAIL

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, S.W., TWB204
Washington, D.C. 20004

Re: Amendment to Petition for Rule Making
Station KOCO-DT, Oklahoma City, Oklahoma

Dear Ms. Salas:

Transmitted herewith, on behalf of Ohio/Oklahoma Hearst-Argyle Television, Inc., licensee of Television Station KOCO-TV, Oklahoma City, Oklahoma, and permittee of Digital Television Station KOCO-DT, are an original and four copies of an Amendment to a Petition for Rule Making requesting amendment of the DTV Table of Allotments, Section 73.622(b) of the Commission's Rules.

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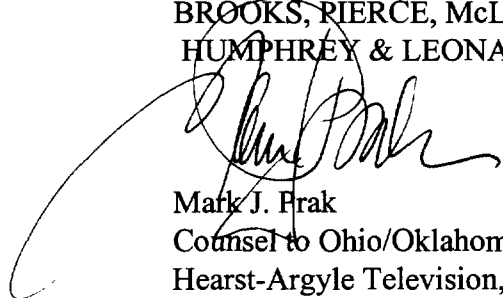
M.M.B.

Ms. Magalie R. Salas
May 17, 1999
Page 2

If any questions should arise during the course of your consideration of this matter, it is respectfully requested that you communicate with this office.

Very truly yours,

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, L.L.P.

A handwritten signature in black ink, appearing to read "Mark J. Frak", is written over the printed name and title. The signature is fluid and cursive, with a large loop at the end.

Mark J. Frak
Counsel to Ohio/Oklahoma
Hearst-Argyle Television, Inc.

MJP/atd
Enclosures

cc: Nazifa Naim

ORIGINAL

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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MAY 18 1999

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In the Matter of)
)
Amendment of Section 73.622(b))
DTV Table of Allotments)
Television Broadcast Stations)

MM Docket No. _____
RM - _____

To: Chief, Allocations Branch
Policy & Rules Division
Mass Media Bureau

AMENDMENT TO PETITION FOR RULE MAKING

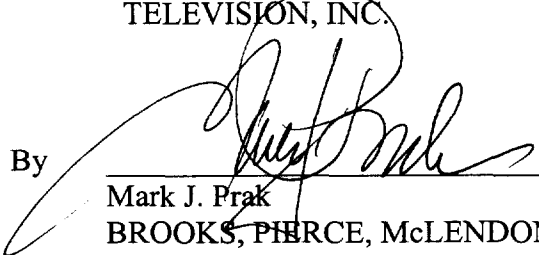
On February 22, 1999, Ohio/Oklahoma Hearst-Argyle Television, Inc. ("Petitioner"), licensee of Television Station KOCO-TV, Oklahoma City, Oklahoma and permittee of Digital Television Station KOCO-DT filed a Petition for Rule Making ("Petition") requesting the Commission to amend Petitioner's DTV channel allotment from Channel 16 to Channel 7.

Attached hereto is an Amended Engineering Statement prepared by Bernard R. Segal, P.E. The amendment provides new supporting information based on the use of a revised directional antenna radiation pattern for the proposed Channel 7 DTV operation. Petitioner respectfully requests that the Commission incorporate this amendment into its consideration of the Petition.

Respectfully submitted,

OHIO/OKLAHOMA HEARST-ARGYLE
TELEVISION, INC.

By



Mark J. Prak
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May 14, 1999

Bernard R. Segal, P.E.
Consulting Engineer
Washington, DC

**AMENDED ENGINEERING STATEMENT
PREPARED ON BEHALF OF
OHIO/OKLAHOMA
HEARST-ARGYLE TELEVISION, INC.
OKLAHOMA CITY, OKLAHOMA**

Ohio/Oklahoma Hearst-Argyle Television, Inc. (hereafter Hearst-Argyle) has on file a petition to amend the DTV Table of Allotments, Section 73.622(b) of the Rules. The Petition seeks to substitute VHF Ch. 7 for UHF Ch. 16 for DTV use by station KOCO-TV, Oklahoma City, Oklahoma. The instant amendment provides new supporting information based on the use of a revised directional antenna radiation pattern for the proposed Ch. 7 DTV operation. With the revised directional antenna pattern, the maximum average effective radiated power will be increased from 37.5 kW to 45.0 kW. The antenna radiation center height above average terrain will continue to be 446 meters.

The particulars for the new radiation pattern are provided in Figures 1A and 2A. Figure 1A is the azimuth pattern for the antenna as provided by the manufacturer. Figure 2A is a tabulation of relative field and effective radiated power data for the antenna. The elevation pattern and

Engineering Statement
Ohio/Oklahoma Hearst-Argyle Television, Inc.
Oklahoma City, Oklahoma

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associated tabulation of data for the elevation pattern for the antenna remain unchanged and are the same as already included as Figures 3 and 4 in the undersigned's Engineering Statement dated, February 12, 1999.

New studies are provided herein which demonstrate that the proposed change in the allotment table will permit a facility that satisfies the coverage and allocation criteria of Section 73.623(c) of the FCC Rules. Figure 5A is a map demonstrating the extent of coverage of the 36 dB μ , F(50,90) contour for the proposed allotment with the new antenna design. Figure 6A is a tabulation of terrain elevation data and distances to the 36 dB μ , F(50,90) contour for the revised allotment facilities. Figure 5A demonstrates that the entire community of Oklahoma City will continue to be encompassed by the DTV coverage contour, and the proposed allotment continues to comply with the principal community coverage requirement of Section 73.625(a).

As to allocation concerns, the study provided herein as Figure 7A demonstrates that no NTSC station will receive interference from the revised KOCO-DT Ch. 7 proposal which affects population in excess of the "de minimis"

Bernard R. Segal, P.E.
Consulting Engineer
Washington, DC

Engineering Statement
Ohio/Oklahoma Hearst-Argyle Television, Inc.
Oklahoma City, Oklahoma

Page 3

2% allowable level. The cumulative interference, where the proposed KOCO-DT facility would cause interference to any NTSC station, will not exceed the maximum allowable of 10%.

As before, no DTV allotments on VHF channels 7 and 8 are close enough for concern.

The study of Figure 7A was performed in the same manner as described in the undersigned's February 12, 1999, Engineering Statement.

With the modified pattern, KOCO-DT would provide 97.9% population service replication relative to the existing KOCO-TV Grade B service population.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 13, 1999.



Bernard R. Segal, P.E.

Dielectric

A Unit of SPX Corporation

Date
Call Letters
Location
Customer
Antenna Type

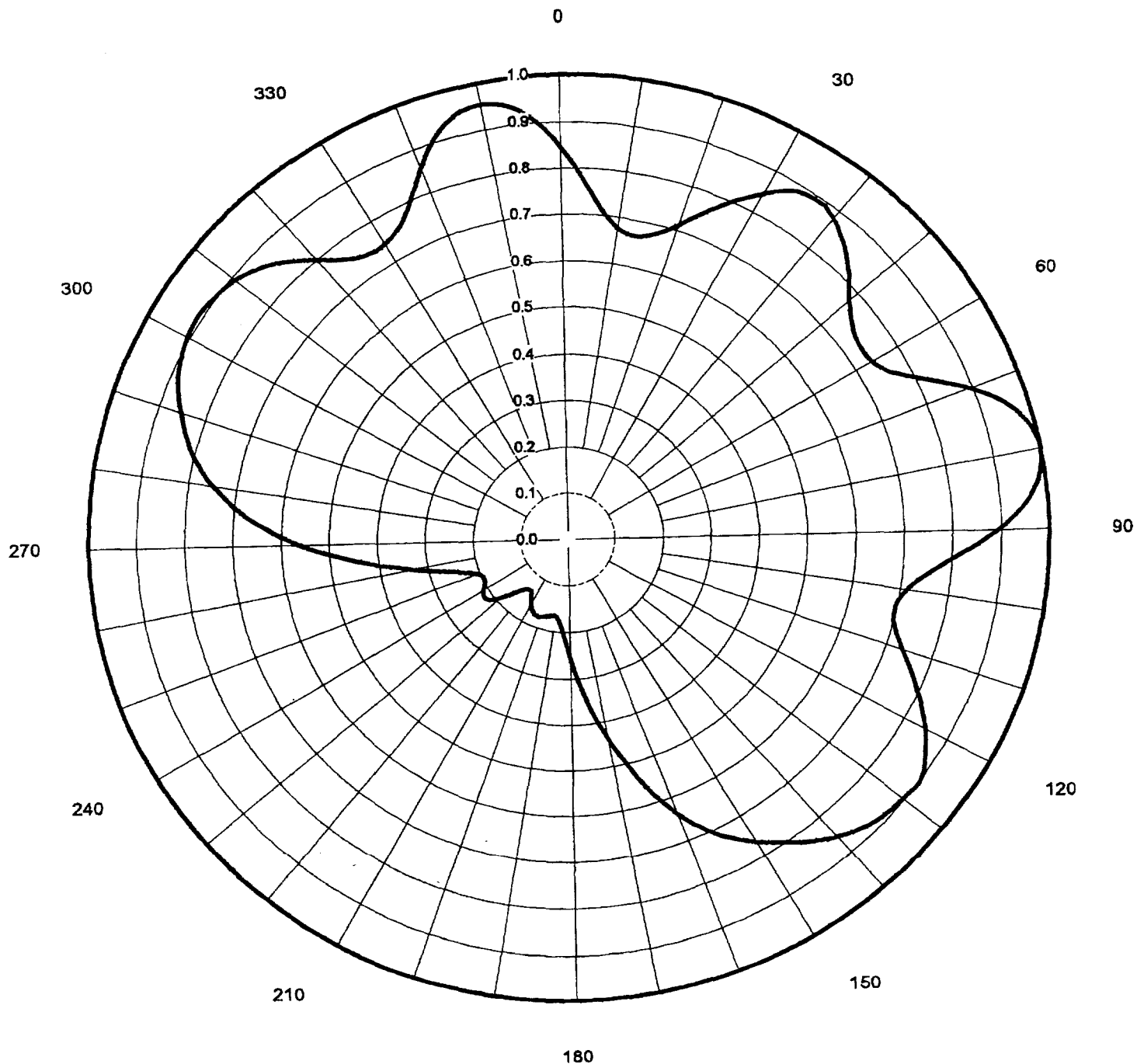
28-Mar-99
KOCO-DT Channel 7
Oklahoma City, OK
THP-SP4-4S-1

AZIMUTH PATTERN

Gain **2.00** (3.01 dB)
Calculated / Measured **Calculated**

Frequency
Drawing #

177.00 MHz
THP-SP4-7



Remarks:

Post Office Box 949, 22 Tower Road, Raymond, Maine 04071

Voice: 207-655-4555 1-800-341-9678 Fax: 207-655-7120 Email: dcsales@dielectric.com

**AMENDED ENGINEERING STATEMENT
PREPARED ON BEHALF OF
OHIO/OKLAHOMA
HEARST-ARGYLE TELEVISION, INC.
OKLAHOMA CITY, OKLAHOMA**

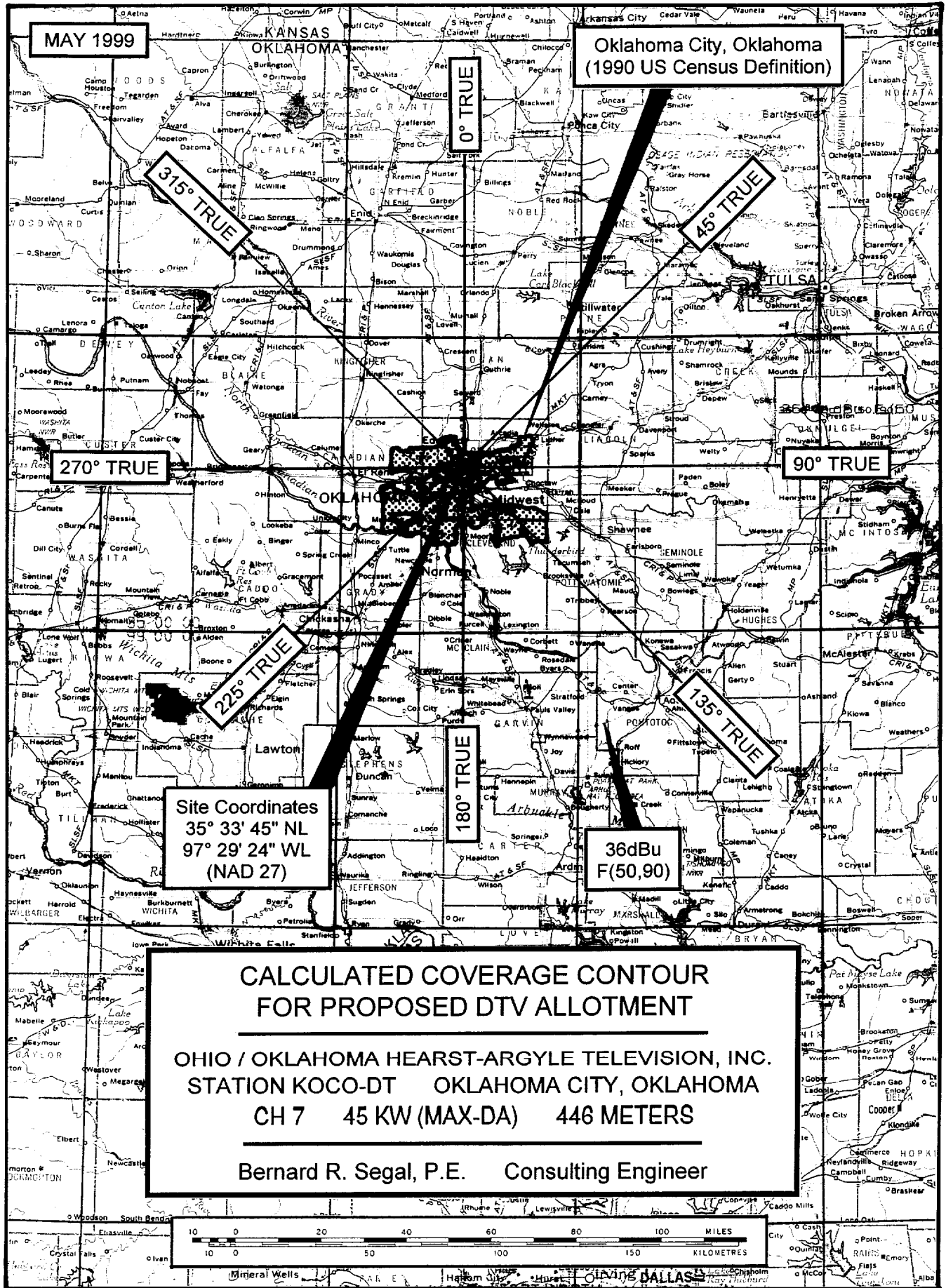
Antenna Azimuth Radiation Pattern Data

<u>Azimuth</u> (deg. T)	<u>Relative</u> <u>Field</u>	<u>Effective</u> <u>Radiated</u> <u>Power</u> (dBk)	<u>Azimuth</u> (deg. T)	<u>Relative</u> <u>Field</u>	<u>Effective</u> <u>Radiated</u> <u>Power</u> (dBk)
0	0.848	15.1	180	0.253	4.60
10	0.677	13.1	190*	0.166	0.934
13*	0.665	13.0	200	0.176	1.44
20	0.710	13.6	202**	0.177	1.49
30	0.844	15.1	210	0.158	0.505
37**	0.893	15.5	217*	0.135	-0.861
40	0.881	15.4	220	0.139	-0.608
50	0.778	14.4	230	0.194	2.29
58*	0.734	13.8	236**	0.216	3.22
60	0.738	13.9	240	0.206	2.81
70	0.893	15.5	246*	0.194	2.29
80**	1.000	16.5	250	0.205	2.77
90	0.893	15.5	260	0.334	7.01
100	0.714	13.6	270	0.562	11.5
104*	0.697	13.4	280	0.748	14.0
110	0.736	13.9	290	0.852	15.1
120	0.852	15.1	300	0.905	15.7
127**	0.902	15.6	303**	0.909	15.7
130	0.896	15.6	310	0.891	15.5
140	0.857	15.2	320	0.799	14.6
150	0.766	14.2	328*	0.741	13.9
160	0.636	12.6	330	0.742	13.9
170	0.436	9.32	340	0.855	15.2
			350**	0.953	16.1

* Local minimum bearing.

** Local maximum bearing.

Figure 5A



**AMENDED ENGINEERING STATEMENT
PREPARED ON BEHALF OF
OHIO/OKLAHOMA
HEARST-ARGYLE TELEVISION, INC.
OKLAHOMA CITY, OKLAHOMA**

Tabulation of Average Elevations and
Distances to the DTV Coverage Contour

Site Coordinates: 35° 33' 45" North Latitude
 97° 29' 24" West Longitude

Antenna Radiation Center: 797 m AMSL

<u>Azimuth</u> (deg. T)	<u>3.2-16.1 km Terrain Avg.</u> (mAMSL)	<u>Radiation Center Above Terrain Avg.</u> (m)	<u>ERP</u> (kW)	<u>Distance to 36 dBμ, F(50,90) Contour</u> (km)
0	353	444	32.3	113.4
15	347	450	21.7	110.2
30	339	458	32.0	114.5
45	326	471	30.9	115.2
60	326	471	24.5	113.0
75	337	460	40.3	116.9
90	347	450	35.9	114.9
105	359	438	23.6	109.9
120	357	440	32.6	113.1
135	355	442	34.6	113.8
150	359	438	26.4	111.0
165	359	438	12.9	104.4
180	363	434	2.9	91.9
195	360	437	1.3	86.3
210	360	437	1.1	85.1
225	359	438	1.3	86.0
240	379	418	1.9	87.9
255	380	417	3.3	91.9
270	367	430	14.2	104.7
285	357	440	28.8	112.0
300	345	452	36.8	115.3
315	340	457	32.1	114.5
330	343	454	24.8	111.8
345	340	457	36.8	115.7
Average*	351	446		

* The average is for the eight standard radials.

**AMENDED ENGINEERING STATEMENT
PREPARED ON BEHALF OF
OHIO/OKLAHOMA
HEARST-ARGYLE TELEVISION, INC.
OKLAHOMA CITY, OKLAHOMA**

NTSC Allocation Study for Proposed KOCO-DT Allotment
Ch. 7, 45.0 kW (MAX-DA), 446 m

NAD 27 Site Coordinates: 35° 33' 45" North Latitude
 97° 29' 24" West Longitude

Antenna Radiation Center: 797 mAMSL

Ch. Relation- ship	Potentially Affected NTSC Station	<u>Appendix B Data¹</u>		<u>Independent Calculations</u>						
		Current Service Pop. (Thous)	Allotted DTV Interf. (%)	Current Service Pop. (Thous)	Noise- Limited Pop. (Thous)	Allotted DTV Interf		New Interference from Prop. KOCO-DT		Cumulative DTV Interf (%)
n-0	KOAM, Pittsburg, KS Ch. 7, 316 kW, 332 m	475	0.0	472	480	0	0.0	9.5	2.0	2.0
	KSWO-TV, Lawton, OK Ch. 7, 316 kW, 320 m	378	0.0	376	388	0	0.0	4.3	1.1	1.1
	KLTV, Tyler, TX Ch. 7, 316 kW, 302 m	619	0.0	615	686	0	0.0	0	0.0	0.0
n+1	KTUL, Tulsa, OK Ch. 8, 316 kW, 578 m	1,095	0.0	1,100	1,146	0	0.0	0	0.0	0.0
n-1	Not applicable									

¹ Per Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket No. 87-268.

n=DTV Ch. 7